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**Subject:** EPA Initial Comments on the Area 2 RI Report  
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Chase,

As we discussed yesterday, in advance of our meeting Thursday, I wanted to provide some initial feedback regarding the Area 2 RI report. EPA has not completed its review of the Area 2 RI report. However, it is apparent that the Area 2 RI report will require significant revisions before it can be approved. I spoke with MDEQ today and they have similar concerns about this document. I have provided some initial comments below. With the Area 3 RI report due at the end of November, we should discuss these comments Thursday, in light of the Area 3 RI submittal, to discuss an appropriate path forward.

If you have any questions, please feel free to contact me. I look forward to our meeting on Thursday.

Thanks  
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#### EPA INITIAL DRAFT COMMENTS ON THE AREA 2 REMEDIAL INVESTIGATION REPORT

1. The Executive Summary fails to summarize the findings of the RI report. It presents a lot of information but does not summarize.
2. The description of the nature and extent of contamination in sediment is cursory and not fully developed. There are lots of summary statistics, but few overall descriptions and conclusions. The discussion of the horizontal and vertical extent of PCB contamination is limited to two paragraphs. The development of SWACs is described in much more detail, but the SWAC information seems more relevant to the FS. The RI should more fully describe the nature and extent in terms of the conceptual site model (i.e., PCB distribution as it relates to timing of releases, geomorphology, and dam history). These sections require additional detail, much of which was included in the first version of the RI, to present a clear understanding of the nature and extent of contamination.
3. This document focuses heavily on the in-stream portion of the data, but does little in describing the flood plain contamination. The document needs to be better balanced in addressing both.
4. The discussion of surface water contamination is also inadequate. The previous document did a

much more comprehensive job describing the surface water data. The document needs to describe the relationships between PCB vs. season, PCB vs. flow, PCB vs. TSS (while controlling for the other variables). They should also look at TSS vs. flow to see if the erosion threshold can be identified. (The Farmer Street bridge data set may be sufficient enough to determine this.)

5. The document is heavily focused on the risk assessments, particularly the TBERA. Most of the TBERA language is directly from the Area 1 TBERA which could be referenced to cut down on text. In addition, it was not changed to incorporate all of EPA's previous comments.
6. The document eliminates Sections A and B from being carried forward in the FS, which is premature at this time. The FS should describe in detail which areas require no further action and support that decision, not the RI report.
7. There are several editorial errors, figures that are not cited, and incomplete figure legends.